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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

K.I.

Plaintiff,

v.

BHARAT TYAGI a/k/a ROCKY SINGH,

Defendant.

Case No. 1:23-cv-1777

DECLARATION OF K.I.

I, K.I., being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration to further explain Defendant's connection to New York.
2. Initially, I am a Certified Registered Nurse Anesthetist, licensed to practice within the State of New York as well as other states.
3. I work as an independent contractor at various hospitals throughout New York State and Maryland, spending several weeks or months working at one facility and then moving onto another.
4. Because Defendant essentially lived with me while we were dating, he followed me to each hospital at which I was working during that time.

5. During our time together, Defendant used my New York property as if it was his own, living there, shopping there, coming and going as he pleased, and enjoying all the benefits of the community and the accommodations, rent-free.

6. The majority of the intimate content which Defendant eventually uploaded online was, in fact, captured and recorded while we were within the State of New York.

7. When I was dating Defendant I worked at ____ New York hospitals; once Defendant started his harassment campaign, I was suspended from working at one of them.

8. First, Defendant uploaded my intimate content online, purposely making statements directed toward me to let me know he was doing it specifically for me to see. For instance, Defendant wrote the following statements superimposed over intimate content depicting me:

- your pussy and asshole are throbbing for me...
- I wanna fuck your asshole so fucking hard top of this mountain
- eat my ass while I'm cumming on your face
- Fucking your ass hole like that
- and the feeling inside you

9. Defendant also uploaded a picture of my dog with "How's he doing" superimposed over the image.

10. Clearly, Defendant was attempting to communicate with me through his online postings.

11. When his posting of my intimate content did not give him the control over my life he so desperately wanted, he attempted to ruin my life using multiple other tactics.

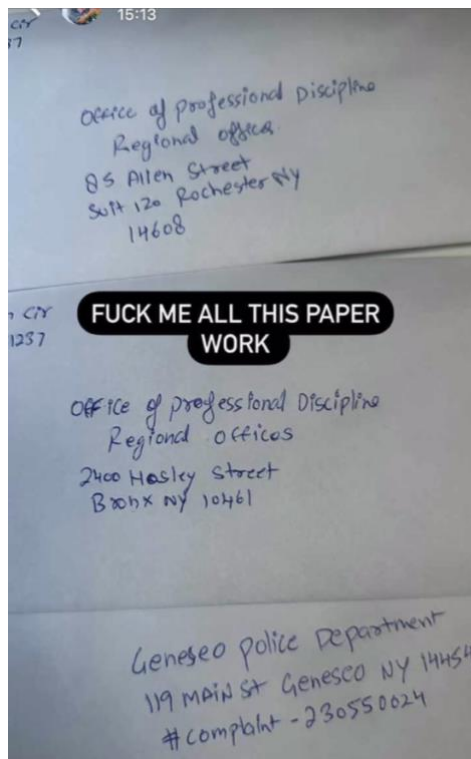
12. Next, Defendant called hospitals throughout New York to falsely report that I was diverting drugs in my capacity as a Certified Registered Nurse Anesthetist. As indicated above, one such hospital suspended me, pending investigation into the Defendant's allegations.

13. After that, as evidenced by the Complaint number below and confirmed by police at in Geneseo, Defendant filed a police report against me in Geneseo making substantially similar claims to those that he made to the hospitals.

14. Police there informed me that officers there met with Defendant and took his report.

15. In addition to the drug allegations, I also suspect he recycled the same claims he made to the police in Maryland: that I drugged and sexually assaulted him, claims which are also, of course, false.

16. Defendant posted this image online in order to inform me of and taunt me with the various bad acts he was undertaking in order to hurt me:



17. As seen in the image above, Defendant also directed letters to two offices of professional discipline in New York State, one in Rochester and another in the Bronx.

18. It is my understanding he has repeated the same false claims that made by phone to the New York hospitals.

19. Unfortunately, the NYSED Office of Professional Discipline has confirmed that they are undertaking an investigation into Defendant's claims.

20. As a result, because of Defendant's calls, written communications, and, upon information and belief, visit to New York, I have lost the ability to work at one New York hospital and my New York professional license is now in jeopardy.

21. Finally, Defendant has family members scattered throughout New York and New Jersey, including cousins in Jackson Heights and Richmond Hill and a sister in Jersey City. It is my understanding that, prior to dating me, Defendant routinely stayed with family in New York City and the surrounding areas and likely still does.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 2, 2023

